



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET, Rm. 3-177  
NEW YORK, NY 10007

**ZACHARY W. CARTER**  
*Corporation Counsel*

**ARTHUR G. LARKIN**  
Senior Counsel  
Phone: (212) 356-2641  
Fax: (212) 356-3509  
alarkin@law.nyc.gov

June 22, 2016

**BY ECF**

Hon. Laura Taylor Swain  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

Re: Mark Nunez v. City of New York, et al., 11-CV-5845 (LTS) (JCF)

Your Honor:

We write jointly on behalf of all parties, and in furtherance of our prior letter request that Your Honor granted (Dkt. 273), in order to seek an additional extension of two (2) weeks of the deadline by which the City must move for a protective order to keep confidential certain information that the Department of Correction (“DOC”) has produced. The current deadline is today, June 22, 2016, and the parties seek an extension of the deadline to July 6, 2016. As we advised Your Honor previously, DOC, plaintiffs’ counsel and the monitor are attempting to resolve all of the issues through negotiation, and over the past two weeks we have made additional progress. We request this extension in order to continue those discussions and, hopefully, resolve the outstanding issues without the need for judicial intervention.

Respectfully submitted,

/s/

Arthur G. Larkin, Esq.  
Senior Counsel

cc: All Counsel (by ECF)